

Documentation of Land Use Plan Conformance and NEPA Adequacy (DNA)

U.S. Department of the Interior Bureau of Land Management

A. Describe the Proposed Action

The proposed action is to construct a dugout type waterhole/reservoir with a dike of less than 6 feet in height and a storage capacity of less than 1 acre/feet. The waterhole would be constructed to receive primary water input from a nearby seasonal spring with additional water input from groundwater and snowmelt. The waterhole would be constructed at T39S, R13E, Section 4, NW¼, NE¼. This is within the BLM Goodlow grazing allotment, #0881.

B. Land Use Plan (LUP) Conformance

LUP Name: Klamath Falls Resource Area Resource Management Plan and Environmental Impact Statement dated September 1994 (RMP/EIS)
Date Approved: June 1995 via the Klamath Falls Resource Area Record of Decision and Resource Management Plan and Rangeland Program Summary (ROD/RMP/RPS)

The proposed action is in conformance with the applicable LUPs because it is specifically provided for in the following LUP decisions:

RMP/EIS, Chapter 2, page 2-59, Grazing Management, Management Actions/Direction, General: *Construct range land improvements as needed to support achievement of management objectives. Range land improvements may include, but are not limited to fence and reservoir construction, spring developments, vegetation manipulation, and prescribed burns. See Appendix L for a listing of proposed range land improvements, for each grazing allotment, predicted to be necessary at this time.*

RMP/EIS, Appendix L-Grazing Management, page L-68:

<u>Allotment Name/#</u>	<u>Type of Improvement</u>	<u>Units</u>	<u>No.</u>
Goodlow (881)	Reservoir	each	1

C. Identify applicable NEPA documents and other related documents that cover the proposed action.

List by name and date all applicable NEPA documents that cover the proposed action.

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D. NEPA Adequacy Criteria

1. Is the current proposed action substantially the same action (or is a part of that action) as previously analyzed? Is the current proposed action located at a site specifically analyzed in an existing document?

Documentation of answer and explanation:

The proposed action was analyzed in the RMP/EIS and identified through the following:

RMP/EIS, Chapter 2, page 2-59, Grazing Management, Management Actions/Direction, General: *Construct range land improvements as needed to support achievement of management objectives. Range land improvements may include, but are not limited to fence and reservoir construction, spring developments, vegetation manipulation, and prescribed burns. See Appendix L for a listing of proposed range land improvements, for each grazing allotment, predicted to be necessary at this time.*

RMP/EIS, Appendix L-Grazing Management, page L-68:

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2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the current proposed action, given current environmental concerns, interests, and resource values?

Documentation of answer and explanation:

The proposed action lies within the range of alternatives analyzed in the RMP/EIS. These are summarized in table S-1 "Comparisons of Allocations and Management by Alternative", pages 18-50 and in table S-2 "Summary of Environmental Consequences by Alternative", pages 52-53. Since this plan is relatively recent, it more than adequately reflects current environmental concerns, interests, and resource values.

3. Is the existing analysis valid in light of any new information or circumstances?

Documentation of answer and explanation:

Since the analysis performed in the RMP/EIS, an Ecological Site Inventory (ESI) was completed for the lands in this area including the Goodlow allotment during 1997 and 1998. The ESI sites in the area of the proposed reservoir show late seral to PNC vegetation communities. The construction of the proposed reservoir would provide for better livestock distribution throughout the allotment which would maintain or improve the current vegetation conditions.

A prescribed fire during 1998 heavily burned an area about ½ mile east of the proposed

reservoir. Prior to the burn the area was rated by the ESI as a PNC shrub community with an excellent understory of native grasses and forbs. The fire burned a large percentage of the shrubs. Bitterbrush seedlings were planted in the area in the spring of 1999 and the area was rested from grazing. Since the proposed reservoir will not be constructed until the late summer of 2000, this area will not be impacted by grazing until 2001, which would give the burned area 2 years of rest and recovery. The reservoir will also help distribute livestock away from this area.

Based on the excellent conditions of the vegetation communities in the allotment and the rest that the prescribed burn area has received, the existing analysis from the RMP/EIS is still considered valid for the proposed action.

A botanical survey of the area was completed on August 21, 1999. A population of *Silene nuda* var. *insectivora* (Fringed campion), a Bureau tracking species, was found along the road to the west of the proposed project site. This site will be avoided by equipment entering the project area and the reservoir will be built away from the plant population. A copy of the survey is attached.

A cultural resource survey of the area was completed on April 18, 2000. No sites were found in the area of the project. A copy of the survey is attached.

4. Do the methodology and analytical approach used in the existing NEPA document(s) continue to be appropriate for the current proposed action?

Documentation of answer and explanation:

The RMP was approved in 1995 and prepared under the guidance provided by BLM planning regulations issued under the authority of the Federal Land Policy and Management Act of 1976 (FLPMA) and in conformance with regulations established by the Council on Environmental Quality regarding the preparation of Environmental Impact Statements as required by the National Environmental Policy Act of 1970 (NEPA). This guidance is currently considered appropriate

5. Are the direct and indirect impacts of the current proposed action substantially unchanged from those identified in the existing NEPA document(s)? Does the existing NEPA document analyze site-specific impacts related to the current proposed action?

Documentation of answer and explanation:

The proposed action is essentially the same action as was analyzed by the existing NEPA documents cited throughout this document. The direct and indirect impacts of livestock grazing and range land improvements in this allotment were analyzed in most of the major sections of Chapter 4 - "Environmental Consequences" in the RMP/EIS. The new information outlined in #3 above would not result in significantly different conditions that would indicate that the previous analysis of impacts would change substantially.

6. Are the cumulative impacts that would result from implementation of the current proposed action substantially unchanged from those analyzed in the existing NEPA document(s)?

Documentation of answer and explanation:

The cumulative impacts of the proposed action are essentially the same as those analyzed in the RMP/EIS Chapter 4 - Environmental Impacts. The new information outlined in #3 above would not result in significantly different conditions that would indicate that the previous analysis of cumulative impacts would change substantially.

7. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?

Documentation of answer and explanation:

The public involvement associated with the NEPA documents referenced above is outlined on pages R-7 and R-8 of the of the ROD/RMP/RPS under Public Involvement. This effort was in conformance with NEPA and FLPMA and is still considered adequate for the proposed action.

E. Interdisciplinary Analysis: Identify those team members conducting or participating in the NEPA analysis and preparation of this worksheet.

<u>Name</u>	<u>Title</u>
Dana Eckard	Rangeland Management Specialist
Matthew Kritzer	Archaeologist
Lou Whiteaker	Botanist
Gayle Sitter	Wildlife Biologist

Conclusion

- ☐ Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of NEPA

____/s./ Teri Raml_____
Teresa Raml
Manager, Klamath Falls Resource Area

____ July 10, 2000_____
Date

Note: The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision.